

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

RUSSELL ZINTER; JACK MILLER; §  
BRIAN HOWD; JAMES A. MEAD; §  
JOSEPH BRANDON PIERCE; MARK BROWN; §  
DAVID BAILEY; JUAN GONZALES JR.; §  
KEVIN EGAN; JONATHON GREEN; §  
JAMES SPRINGER §

Plaintiffs,

VS.

CIVIL ACTION NO. 5:18-CV-0680-FB

CHIEF JOSEPH SALVAGGIO; §  
 LIEUTENANT DAVID ANDERSON; §  
 DEPUTY JANE DOE GOLDMAN; §  
 OFFICER JOHNNY VASQUEZ; §  
 CPL CHAD MANDRY; SERGEANT JOHN DOE; §  
 OFFICER JIMMIE WELLS; CPL. LOUIS FARIAS, §  
 BADGE 534; OFFICER BRANDON EVANS, §  
 BADGE 556; OFFICER UZIEL HERNANDEZ; §  
 JOHN DOE TASER 1; JOHN DOE TASER 2 AND §  
 THE CITY OF LEON VALLEY, A POLITICAL §  
 SUBDIVISION OF THE STATE OF TEXAS §

Defendants.

**DEFENDANTS CHIEF SALVAGGIO, LT. ANDERSON, SGT. URDIALES, DET. KING,  
CPL. MANDRY, CPL. FARIAS, AND OFFICERS VASQUEZ, WELLS, EVANS,  
HERNANDEZ, YARBROUGH, BRETON, AZAR, CASTRO, TACQUARD,  
AND RIVERA DESIGNATION OF WITNESSES, EXPERTS AND EXHIBITS**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE DAVID A. EZRA:**

Now comes **CHIEF SALVAGGIO, LT. ANDERSON, SGT. URDIALES, DET. KING, CPL. MANDRY, CPL. FARIAS, AND OFFICERS VASQUEZ, WELLS, EVANS, HERNANDEZ, YARBROUGH, BRETON, AZAR, CASTRO, TACQUARD, and RIVERA**, Defendants in the above entitled and numbered cause, and file this their Designation of Witnesses, Experts and Exhibits pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure.

**I.**

Defendants **CHIEF SALVAGGIO, LT. ANDERSON, SGT. URDIALES, DET. KING, CPL. MANDRY, CPL. FARIAS, AND OFFICERS VASQUEZ, WELLS, EVANS, HERNANDEZ, YARBROUGH, BRETON, AZAR, CASTRO, TACQUARD, and RIVERA**, hereby designate the following fact and expert witnesses in the above styled and numbered cause:

**RUSSELL ZINTER**  
**JACK MILLER**  
**BRYAN HOWD**  
**JAMES MEAD**  
**MARK BROWN**  
**DAVID BAILEY**  
**JUAN GONZALES, JR.**  
**KEVIN EAGAN**  
**JONATHON GREEN**  
**JAMES SPRINGER**  
**GREG GARDINER**  
**JASON GREEN**  
**THERESA RICHARD**

c/o Plaintiffs' Counsel Brandon J. Grable  
Grable Law Firm PLLC  
1603 Babcock Road, Suite 118  
San Antonio, Texas 78229

Witnesses have knowledge of their anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018, and June 23, 2018. Plaintiffs have knowledge regarding their disruptive and criminal behavior that resulted in arrests, detentions and seizure of evidence during the times in question. Plaintiff Jack Miller has knowledge regarding his May 31, 2018 incident and arrest.

**SELENA HERRERA, PLAINTIFF**  
202 S. Hoy Street  
Buffalo, Oklahoma 73834

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**BRANDON JOSEPH PIERCE, PLAINTIFF**  
644 Kerry  
Crowley, Texas 76026

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**CHIEF JOSEPH SALVAGGIO**

**LT. DAVID ANDERSON**

**SGT. JOEL URDIALES**

**DET. ALEX KING**

**CPL. CHAD MANDRY**

**CPL. LOUIS FARIAS**

**OFFICER JOHNNY VASQUEZ**

**OFFICER JIMMIE WELLS**

**OFFICER BRANDON EVANS**

**OFFICER UZIEL HERNANDEZ**

**OFFICER CLARENCE YARBROUGH**

**OFFICER JORGE BRETON**

**OFFICER JOANN AZAR**

**OFFICER BENJAMIN CASTRO**

**OFFICER MIKE TACQUARD**

**OFFICER ERIKA RIVERA**

c/o Law Offices of Charles S. Frigerio

111 Soledad St Ste 465

San Antonio, Tx 78205

Defendants have knowledge regarding their training experience and duties as officers with the City of Leon Valley Police Department in general and specifically as it applies to the lawsuit in question. Defendants have knowledge regarding Plaintiffs' anti-police demonstrations at the City of Leon Valley on June 14, 2018, June 18, 2018 and June 23, 2018. Defendants have knowledge regarding Plaintiff's disruptive and criminal behavior that resulted in arrests, detentions and seizure of evidence during the times in question. Defendants have knowledge regarding the May 31, 2018 incident and arrest of Plaintiff Jack Miller.

**OFFICER RIGOBERTO PARRA**

**SGT. KASEY BURLESON**

**CPL. TERRY BROOKS**

**OFFICER ANDY GRIECO**

**CAPTAIN RUBEN SAUCEDO**

**OFFICER RUDY MUNOZ**

**CORPORAL CARLOS CARRILLO**

Leon Valley Police Department

6400 El Verde Road

Leon Valley, Texas 78238

(210) 684-1391

Witnesses have knowledge regarding their training experience and duties as officers with the City of Leon Valley Police Department in general and specifically as it applies to the lawsuit in question. Witnesses have knowledge regarding Plaintiffs' anti-police demonstrations at the City

of Leon Valley on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding Plaintiff's disruptive and criminal behavior that resulted in arrests, detentions and seizure of evidence during the times in question. Witnesses have knowledge regarding the May 31, 2018 incident and arrest of Plaintiff Jack Miller.

**CHIEF DAVID GONZALES (PRESENT)**

Leon Valley Police Department  
6400 El Verde Road  
Leon Valley, Texas 78238  
(210) 684-1391

Witness has knowledge regarding his duties training and experience as a police officer and Chief of Police with the City of Leon Valley Police Department in general and specifically as it applies to the lawsuit in question. Witness has knowledge regarding Plaintiffs' anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018, and June 23, 2018. Witness has knowledge regarding Plaintiffs' disruptive criminal behavior that resulted in arrests, detentions and seizure of evidence during the times in question. Witness has knowledge regarding the May 31, 2018 incident and arrest of Plaintiff Jack Miller.

**JOSHUA RUSSELL**

1643 Lacy Drive  
Lipan, Texas 76462  
(817) 694-3901

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**KRISTEN BOKKER**

610 Colwyn Pass  
San Antonio, Texas 78216  
(775) 335-9889

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**JULIA ALCOCES**

233 Bobbies Lane  
San Antonio, Texas 78201  
(210) 740-4588

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**SARAH WINTERS**

610 Colwyn Pass  
San Antonio, Texas 78216  
(210) 439-5498

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**JASON MALDONADO**

82 Roundup Road  
San Antonio, Texas 78213  
(210) 612-9329

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**ALDO HERNANDEZ**

414 Amberdale Oak  
San Antonio, Texas 78249  
(956) 763-9569

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**DAVID WARDEN**

Address and Telephone Unknown

Witness has knowledge regarding the anti-police demonstrations at the City of Leon Valley Police Department on June 14, 2018, June 18, 2018 and June 23, 2018. Witnesses have knowledge regarding disruptive and criminal behavior by parties and those anti-police demonstrations at the City of Leon Valley P.D.

**CLIFFORD C. HERBERG JR.**

320 W. Lullwood Ave.  
San Antonio, Texas 78212  
(512) 936-2935

Expert is an attorney and former prosecutor who will testify regarding his experience and training as a former prosecutor and his criminal intake experience.

Expert witness is presently employed as General Counsel and Senior Director of the Alamo Area Council of Governments (AACOG) and has been so employed with AACOG since August 10,

2015. Expert was employed as a Senior Attorney with the Texas Attorney General's Office from January 20, 2015 through August 7, 2015. His duties with the Attorney General's Office included investigating and prosecuting high profile and complex white collar crime and public corruption cases across the State of Texas.

Expert was employed as First Assistant Criminal District Attorney with the Bexar County District Attorney's Office from October 5, 2005 through December 31, 2014. His duties as First Assistant Criminal District Attorney included supervising the day to day operations of the office including oversight of 170 Assistant District Attorneys, 46 peace officer investigators and staff members. Expert as the First Assistant D.A. provided strategic advice to assistant district attorneys regarding plea agreements in complex criminal cases. Expert is an experienced trial lawyer who tried more than 60 cases to jury verdict as lead attorney and oversaw the prosecution of thousands of civil and criminal cases.

Expert was employed as a Division Chief with the Bexar County District Attorney's Offices from January 1, 1999 through October 5, 2005. His duties as Division Chief included supervising assistant district attorneys and investigators in the investigation and prosecution of complex criminal cases.

Expert was employed as a member with the Rush, Herberg & Oransee Law Firm from February 14, 1994 through February 31, 1998 handling criminal trials and appeals.

Expert was employed as an Assistant Criminal District Attorney with the Bexar County District Attorney's Office from May 20, 1992 through February 10, 1994 prosecuting numerous felony and misdemeanor criminal cases in the District and County Courts of Bexar County, Texas. Expert obtained his Juris Doctorate Degree from St. Mary's University in 1990 and a B.A. Degree from St. Mary's University in 1987.

Expert will testify whether the Defendants' conduct at issue met the accepted standards in the field of law enforcement regarding the filing of criminal charges with state and federal law enforcement agencies including the Bexar County District Attorney's Office, the U.S. Attorney and F.B.I. Expert will testify whether the Defendant's conduct at issue met the accepted standards in the field of law enforcement regarding the filing of criminal charges and seizure of evidence.

Expert will testify based upon his training, experience and the evaluation of facts contained in the police reports, videos, pleadings, discovery and production in this cause.

For further information regarding expert's qualifications and experience, please refer to his attached resume. The expert does not have any publications other than his legal article published in the St. Mary's Law Journal in the 21 St. Mary's Law Journal 233 (1989). Expert will be compensated for his testimony at \$250.00 per hour. Expert Report is attached.

Defendants herein reserves the right to list any and all witnesses or experts named by Plaintiffs or Co-Defendants.

## II.

Defendants **CHIEF SALVAGGIO, LT. ANDERSON, SGT. URDIALES, DET. KING, CPL. MANDRY, CPL. FARIAS, AND OFFICERS VASQUEZ, WELLS, EVANS, HERNANDEZ, YARBROUGH, BRETON, AZAR, CASTRO, TACQUARD, and RIVERA,,** hereby designate the following retained expert witness(s) in the above styled and numbered cause.

**Clifford C. Herberg Jr.**

320 W. Lullwood Ave.  
San Antonio, Texas 78212  
(512) 936-2935

Expert is an attorney and former prosecutor who will testify regarding his experience and training as a former prosecutor and his criminal intake experience.

Expert witness is presently employed as General Counsel and Senior Director of the Alamo Area Council of Governments (AACOG) and has been so employed with AACOG since August 10, 2015. Expert was employed as a Senior Attorney with the Texas Attorney General's Office from January 20, 2015 through August 7, 2015. His duties with the Attorney General's Office included investigating and prosecuting high profile and complex white collar crime and public corruption cases across the State of Texas.

Expert was employed as First Assistant Criminal District Attorney with the Bexar County District Attorney's Office from October 5, 2005 through December 31, 2014. His duties as First Assistant Criminal District Attorney included supervising the day to day operations of the office including oversight of 170 Assistant District Attorneys, 46 peace officer investigators and staff members. Expert as the First Assistant D.A. provided strategic advice to assistant district attorneys regarding plea agreements in complex criminal cases. Expert is an experienced trial lawyer who tried more than 60 cases to jury verdict as lead attorney and oversaw the prosecution of thousands of civil and criminal cases.

Expert was employed as a Division Chief with the Bexar County District Attorney's Offices from January 1, 1999 through October 5, 2005. His duties as Division Chief included supervising assistant district attorneys and investigators in the investigation and prosecution of complex criminal cases.

Expert was employed as a member with the Rush, Herberg & Oransee Law Firm from February 14, 1994 through February 31, 1998 handling criminal trials and appeals.

Expert was employed as an Assistant Criminal District Attorney with the Bexar County District Attorney's Office from May 20, 1992 through February 10, 1994 prosecuting numerous felony and misdemeanor criminal cases in the District and County Courts of Bexar County, Texas. Expert obtained his Juris Doctorate Degree from St. Mary's University in 1990 and a B.A. Degree from St. Mary's University in 1987.



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Expert will testify based upon his training, experience and the evaluation of facts contained in the police reports, videos, pleadings, discovery and production in this cause.

For further information regarding expert's qualifications and experience, please refer to his attached resume. The expert does not have any publications other than his legal article published in the St. Mary's Law Journal in the 21 St. Mary's Law Journal 233 (1989). Expert will be compensated for his testimony at \$250.00 per hour. Expert's Report is attached.

Defendants herein reserve the right to list any and all witnesses or experts named by Plaintiffs or Co-Defendants.

### III.

Defendants **CHIEF SALVAGGIO, LT. ANDERSON, SGT. URDIALES, DET. KING, CPL. MANDRY, CPL. FARIAS, AND OFFICERS VASQUEZ, WELLS, EVANS, HERNANDEZ, YARBROUGH, BRETON, AZAR, CASTRO, TACQUARD, and RIVERA**, hereby designates the following exhibits in the above styled and numbered cause.

1. June 18, 2018 Body Cam Video of Corporal Louis Farias;
2. June 18, 2018 Body Cam Video of Officer Joann Azar;
3. June 18, 2018 Body Cam Video of Officer Erika Rivera;
4. June 18, 2018 Body Cam Video of Officer Joel Uridales;
5. May 2, 2018 Video by Jesus Padilla;
6. June 23, 2018 Protesting the Sovereign Citizens Video by James Springer live streaming Chief Salvaggio's home address;
7. Audio Recording of Zinter in Federal Court hearing posted by Jack Miller.
8. Attacked at San Antonio Municipal Court video by Jack Miller.
9. Texas Sheepdog Hit by SWAT Team video by Jack Miller.
10. Jack Miller for DA Video making line complaint.
11. Video of Jesus Padilla Arrest at Leon Valley.
12. Leon Valley Press Conference Video by Auditor.
13. Mexican Padilla (Jesus Padilla) No Sympathy Video by Auditor.
14. June 18, 2018 Tazed and arrested by Leon Valley Video by Auditor.
15. The Discussion Video by James Freeman.
16. The future of Leon Valley Police Department Video by Auditor.
17. Unbelievable Strong Language Video by Auditor.
18. When Texas had my back video by Jesus Padilla.
19. Words Video by Jack Miller.



20. Contact with James Springer video.
21. Jack Miller and Leon Valley Video.
22. City of Leon Valley Municipal Facility schematics.
23. June 14, 2018 Municipal Court Order.
24. June 23, 2018 Leon Valley Police Department Report by Officer Chad Mandry with Supplement Report.
25. Summary of June 14, 2018, June 18, 2018 and June 23, 2018 police incidents at Leon Valley.
26. July 18, 2018 Supplemental Report by Lt. David Anderson regarding James Springer.
27. July 18, 2018 Supplemental Report by Lt. David Anderson regarding Bao Nyguen.
28. Copies of posts by Auditors.
29. January 9, 2019 Det. Brooks Letter to Google.
30. February 18, 2019 Det. Brooks Letter to Google.
31. 2018-W-0206 Affidavit for Search Warrant with Exhibit Attachments.
32. 2018-W-0207 Affidavit for Search Warrant with Exhibit Attachments.
33. 2018-W-0208 Affidavit for Search Warrant with Exhibit Attachments.
34. 2018-W-0209 Affidavit for Search Warrant with Exhibit Attachments.
35. 2018-W-0994 Affidavit for Search Warrant.
36. May 17, 2018 Affidavit for Search Warrant by Det. Brooks.
37. August 31, 2018 Affidavit by Bexar County Assistant District Attorney Brandon Ramsey.
38. Evidence and Search Warrants list.
39. Seized property outlines.
40. Seized property list.
41. Auditor Arrest/Pending Arrest List.
42. Leon Valley Police Department Rules and Regulations Policy.
43. Leon Valley Police Department Purpose, Function and Tactics Policy.
44. Leon Valley Police Department Conducted Electronic Weapons Policy.
45. Leon Valley Police Department Use of Force Policy.
46. Leon Valley Police Department Eyewitness Identification Policy.
47. Leon Valley Police Department Organizational Structure Policy.
48. March 17, 2020 Charge Report by Det. King.
49. June 1, 2018 Supplement Report by Det. King.
50. March 13, 2020 Letter from Chief Salvaggio to DA's Office.
51. March 13, 2020 Letter from Municipal Court Judge Morales.
52. Letter from Municipal Court Senior Court Clerk Garcia.
53. June 12, 2018 Affidavit for Search Warrant by Det. King.
54. June 12, 2018 Search Warrant by District Judge.
55. June 4, 2018 Search Warrant by Magistrate Tavera.
56. June 4, 2018 Affidavit for Search Warrant by Sgt. Gonzales.
57. May 4, 2018 Search Warrant Return by Det. King.
58. June 4, 2018 Search Warrant by Magistrate Tavera.
59. May 31, 2018 Search Warrant Return by Det. King.
60. May 31, 2018 Search Warrant by Magistrate Tavera.
61. June 1, 2018 Email from Rivera.
62. June 5, 2018 San Antonio Police Department Computer Forensic Lab Request.
63. June 4, 2018 Supplemental Report by Det. Wells.

64. Photograph of Jack Miller.
65. San Antonio Police Department First and Second Amendment Auditor Tactics Bulletin.
66. May 31, 2018 Supplemental Report by Lt. Anderson regarding Jack Miller.
67. May 31, 2018 Supplemental Report by Capt. Ruben Saucedo regarding Jack Miller.
68. May 31, 2018 Leon Valley Police Department Complaint form by Jack Miller.
69. May 31, 2018 Supplemental Report by Det. Walls.
70. May 31, 2018 Supplemental Report by Officer Rivera.
71. May 31, 2018 Supplemental Report by Officer Tacquard.
72. June 5, 2018 Email from Garibay to Det. King.
73. May 20, 2019 Bexar County Property Receipt.
74. June 18, 2018 Leon Valley Police Department Release of Property Form.
75. May 31, 2018 Warrant of Arrest by Magistrate Tavera.
76. May 31, 2018 Affidavit for Arrest Warrant by Det. King.
77. May 31, 2018 Search Warrant by Magistrate Tavera.
78. May 31, 2018 Affidavit for Search Warrant by Magistrate Tavera.
79. May 31, 2018 Search Warrant by Magistrate Tavera.
80. May 31, 2018 Incident Report by Officer Vasquez.
81. June 1, 2018 Incident Report by Officer Grieco.
82. June 1, 2018 Charge Report by Det. King.
83. June 1, 2018 Supplemental Report by Det. King.
84. June 1, 2018 Charge Report by Det. King.
85. June 5, 2018 San Antonio Police Department Computer Forensic Lab Report.
86. June 5, 2018 Email from Gonzales to Det. King.
87. May 31, 2018 Warrant of Arrest by Magistrate Tavera.
88. May 31, 2018 Affidavit for Arrest Warrant by Det. King.
89. June 15, 2018 Email from Passailaigue to Shoquist.
90. June 1, 2018 Assist Agency Report.
91. June 1, 2018 Kirby Police Department Report by Officer Lackey.
92. June 1, 2018 Call for Service Report.
93. June 1, 2018 NCIC Report regarding Jack Miller.
94. June 1, 2018 Photograph of Jack Miller.
95. June 1, 2018 NCIC and Photograph of Matthew Pesina.
96. June 1, 2018 NCIC and Photograph of Annabelle Campbell.
97. June 1, 2018 NCIC and Photograph of Lisa Pesina.
98. June 1, 2018 NCIC Report of Narvaiz.
99. Google photo and map of 4839 Dick Gordon.
100. June 1, 2018 Kirby Police Department Report by Officer Alonzo.
101. June 1, 2018 Kirby Police Department Report by Officer Jones.
102. June 1, 2018 Kirby Police Department Report by Officer Murphy.
103. June 25, 2018 Email from Anderson to Brooks.
104. June 11, 2018 Email from Gonzales to Anderson.
105. May 31, 2018 Schematic of Jack Miller Home.
106. June 1, 2018 Email from Rivera to King.
107. Handwritten list of witnesses.
108. May 31, 2018 Email from Breton to Brooks.
109. Texas Government Code Section 411.209 Wrongful Exclusion of Concealed Handgun License Holder.
110. Google Maps of 6400 El Verde to Dicore Drive.

111. May 31, 2018 Leon Valley Police Department Search Warrant Checklist.
112. May 31, 2018 Email from Gonzales to Tacquard.
113. May 31, 2018 Bexar County Sheriff's Office Arrest Booking Sheet
114. May 31, 2018 Affidavit Search Warrant by Det. King.
115. May 31, 2018 Statement of Facts by Jack Miller.
116. June 9, 2018 Email from Chief Salvaggio to Gonzales.
117. June 8, 2018 Email from Attorney General to Jack Miller.
118. June 12, 2018 Email from Salvaggio to Saucedo.
119. May 31, 2018 Leon Valley Police Department Complaint form by Jack Miller with Statement of Fact.
120. June 4, 2018 Search Warrant by Magistrate Tavera.
121. June 4, 2018 Affidavit for Search Warrant by Sgt. Gonzales.
122. June 4, 2018 Search Warrant by Magistrate Tavera.
123. May 31, 2018 Leon Valley Police Department Complaint by Jack Miller.
124. July 5, 2018 First Amendment Complaint by Zinter, et al v. Chief Salvaggio, et al.
125. October 10, 2018 Initial Case Report by Det. Munoz.
126. Cordero Rejection Explanation Document.
127. June 27, 2018 Charge Report by Det. Munoz.
128. March 29, 2019 Property Receipts by Officer Rivera.
129. Certified Mail Receipts regarding Brown, Zinter, Meade, Bailey and Gonzales.
130. Digital Medial Forensic Examination Worksheet.
131. Joseph Pierce Driver's license and debit card.
132. June 21, 2018 NCIC James Springer.
133. June 19, 2018 Property Receipt regarding Joseph Pierce and June 12, 2018 Property Receipt regarding James Springer.
134. June 18, 2018 Property Receipt regarding Juan Gonzales and June 18, 2018 Property Receipt regarding Juan Gonzales.
135. June 14, 2018 Statement by Scott Beal.
136. June 18, 2018 Supplemental Report by Det. Munoz.
137. County SID Document regarding David Bailey.
138. June 18, 2018 Incident Report by Officer Farias.
139. June 18, 2018 Supplemental Report by Lt. Anderson.
140. June 18, 2018 Supplemental Report by Officer Tacquard.
141. June 5, 2019 Charge Report by Det. Munoz regarding Boa Nugyen.
142. June 5, 2019 Charge Report By Det. Munoz regarding James Springer.
143. June 5, 2019 Charge Report by Det. Munoz regarding Perez.
144. June 5, 2019 Charge Report by Det. Munoz regarding Jesus Padilla.
145. June 5, 2019 Charge Report by Det. Munoz regarding Jack Miller.
146. June 5, 2019 Charge Report by Det. Munoz regarding Bailey.
147. June 5, 2019 Charge Report by Det. Munoz regarding Brown.
148. June 5, 2019 Charge Report by Det. Munoz regarding Pierce.
149. June 5, 2019 Charge Report by Det. Munoz regarding Worden.
150. June 5, 2019 Charge Report by Det. Munoz regarding Padilla.
151. June 5, 2019 Charge Report by Det. Munoz regarding Miller.
152. June 5, 2019 Charge Report by Det. Munoz regarding Brown.
153. June 5, 2019 Charge Report by Det. Munoz regarding Boa Ngyuen.
154. June 5, 2019 Charge Report by Det. Munoz regarding Springer.
155. June 5, 2019 Charge Report by Det. Munoz regarding Perez.

156. June 5, 2019 Charge Report by Det. Munoz regarding Bailey.
157. June 5, 2019 Charge Report by Det. Munoz regarding Pierce.
158. June 5, 2019 Charge Report by Det. Munoz regarding Worden.
159. Civil Rights Lawsuit allegations by David Bailey and Joseph Pierce.
160. June 23, 2018 Supplemental Report by Det. Munoz.
161. July 10, 2018 Memo from Chief Salvaggio to Det. Munoz.
162. June 23, 2018 Criminal Trespass Warning to Springer.
163. June 23, 2018 Criminal Trespass Warning to Boa Ngyuen.
164. June 23, 2018 Criminal Trespass Warning to Pierce.
165. June 23, 2018 Criminal Trespass Warning to Green.
166. June 23, 2018 Criminal Trespass Warning to Howd.
167. June 23, 2018 Incident Report by Chad Mandry.
168. June 23, 2018 Chain of Custody Report.
169. June 25, 2018 Det. Wells Letter to Google.
170. March 3, 2020 Initial Case Report by Justin Fisher.
171. June 25, 2018 Det. Wells Letter to Google.
172. June 25, 2018 Email from Google to Det. Wells.
173. June 24, 2018 Email from Chief Salvaggio to Det. Wells.
174. List of arrested Auditors.
175. June 23, 2018 Criminal History Request regarding Howd.
176. June 23, 2018 Criminal History Request regarding Pierce.
177. June 23, 2018 Criminal History Request regarding Springer.
178. June 23, 2018 Criminal History Request regarding Boa Ngyuen.
179. June 26, 2018 Email from Google to Det. Wells.
180. June 26, 2018 Email from Google to Det. Wells.
181. June 23, 2018 Email from Google to Det. Wells.
182. YouTube Terms of Service.
183. January 22, 2019 Charge Report by Det. Munoz regarding Perez.
184. June 23, 2018 Supplemental Report by Det. Munoz regarding Perez.
185. June 23, 2018 Supplemental Report by Det. Munoz regarding Boa Ngyuen.
186. July 10, 2018 Memo from Chief Salvaggio to Det. Munoz.
187. June 14, 2018 Incident Report by Officer Urdiales regarding Padilla.
188. June 23, 2018 Bexar County Sheriff's Office Letter to Det. Wells.
189. June 18, 2018 Incident report by Officer Farias regarding Bailey and Springer arrest.
190. June 14, 2018 Incident Report by Officer Vasquez regarding Mark Brown arrest.
191. June 23, 2018 Chain of Custody Report regarding Aldo Hernandez.
192. June 23, 2018 Chain of Custody Report regarding Aldo Hernandez and Gregory Gardiner.
193. June 23, 2018 Property Receipt regarding Pierce.
194. April 23, 2018 Property Receipt regarding Boa Nguyen.
195. June 23, 2018 Property Receipt regarding Pierce.
196. June 23, 2018 Property Receipt regarding Jason Maldonado.
197. June 23, 2018 Property Receipt regarding Joshua Russell.
198. June 23, 2018 Property Receipt regarding James Mead.
199. Notes regarding Boa Nguyen Video Live Streaming.
200. Notes regarding June 23, 2018 James Freeman Video Live Streaming.
201. Driver's License search of Earl Worden.
202. Notes regarding June 14, 2018, June 18, 2018, and June 23, 2018 arrests.
203. June 23, 2018 Consent to search by Aldo Hernandez.

- 204. September 20, 2018 Email from Google to Det. Wells regarding Law Enforcement Request.
- 205. September 20, 2018 Letter from Det. Wells to Google.
- 206. June 23, 2018 Letter from Det. Wells to Google.
- 207. Bexar County Sheriff's Office Criminal History regarding Springer and Worden.
- 208. Bexar County Sheriff's Office Records Documents regarding Perez.
- 209. Search Warrants issued for devices.
- 210. October 8, 2018 Email from Chief Salvaggio to Gonzales.
- 211. Auditor arrests and Pending arrests Document.
- 212. Certified Mail receipts regarding Howd, Herrera, Gardiner, Meade, Russell, Worden, Richards, Pierce, Jason Green.
- 213. Emails between Leon valley Police Department and FBI.
- 214. Texas Commission on Law Enforcement (TCOLE) Resumes of all Defendant Officers.

Defendants herein reserve the right to list any and all exhibits listed by Plaintiffs and/or Co-Defendants.

Respectfully submitted,

**LAW OFFICES OF CHARLES S. FRIGERIO**

A Professional Corporation

Riverview Towers

111 Soledad, Suite 840

San Antonio, Texas 78205

(210) 271-7877

(210) 271-0602 Telefax

Email: [csfrigeriolaw@sbcglobal.net](mailto:csfrigeriolaw@sbcglobal.net)

[frigeriolaw1995@sbcglobal.net](mailto:frigeriolaw1995@sbcglobal.net)

BY: /s/ Charles S. Frigerio

CHARLES S. FRIGERIO

SBN: 07477500

ATTORNEY-IN-CHARGE

HECTOR X. SAENZ

SBN: 17514850

**ATTORNEYS FOR DEFENDANTS CHIEF OF POLICE**

**JOSEPH SALVAGGIO, LT. DAVID ANDERSON, SGT. JOEL**

**URDIALES, DET. ALEX KING, CPL. CHAD MANDRY, CPL.**

**LOUIS FARIAS, OFFICER JOHNNY VASQUEZ, OFFICER**

**JIMMIE WELLS, OFFICER BRANDON EVANS, OFFICER**

**UZIEL HERNANDEZ, OFFICER CLARENCE YARBOROUGH,**

**OFFICER JORGE BRETON, OFFICER JOANN AZAR,**

**OFFICER BENJAMIN CASTRO, OFFICER MIKE TAQUARD,**

**OFFICER ERIKA RIVERA**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of November, 2021, I electronically filed the foregoing Defendant Officers Designation of Witnesses, Experts and Exhibits with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mr. Brandon J. Grable  
Mr. Austin Reyna  
Grable Law Firm PLLC  
1603 Babcock Road, Suite 118  
San Antonio, Texas 78229

Mr. Adolfo Ruiz  
Mr. Patrick Bernal  
Denton Navarro Rocha Bernal & Zech  
2517 North Main Avenue  
San Antonio, TX 78212

Mr. Brandon Joseph Pierce  
644 Kerry  
Crowley, Texas 76026

Ms. Selena Herrera  
202 S. Hoy Street  
Buffalo, Oklahoma 73834

/s/ Charles S. Frigerio  
CHARLES S. FRIGERIO